

### **Remark**

Applicant respectfully requests reconsideration of this application as amended. Claims 1, 3, 8, 9, 10, 13, 14, 15, 18 and 20 have been amended. No claims have been cancelled. Therefore, claims 1-23 are present for examination.

### **35 U.S.C. §112 Rejection**

The Examiner has rejected claim 18 under 35 U.S.C. §112, second paragraph, for a lack of antecedent basis. The claim is amended.

### **35 U.S.C. §102 Rejection**

#### *Stecyk et al*

The Examiner has rejected claims 1-23 under 35 U.S.C. §102(e) as being anticipated by Stecyk, U.S. Patent Publication No. 2002/0171624 (“Stecyk”). Stecyk shows a universal remote control that operates through an IR blaster controlled by a television set. Referring to Figure 5, infrared user commands from the Mitsubishi television remote control 20 are received by an IR detector 103 of the television set and then relayed eventually through an IR blaster 135 to external devices 136. The external devices are indicated as Infra Red controlled (IRC) and may be other brands. There is no return loop and no generation of commands separate and apart from the user pushing buttons on the remote control.

This rejection is very similar to the earlier universal remote control Kim (U.S. Patent No. 6,334,217) rejection originally made over three years ago. However, Stecyk shows in Figure 5 a more complex universal remote apparatus.

The Examiner has parsed the various blocks shown in Figure 5 into two groups. The first group, TV Control Module 140, AV Connection Manager 112, Graphical User Interface 114 are attributed to the claimed graphics controller and the second group Device Management System 116 (including a device model object, DMO, that includes an IR code file identifier) is attributed to the claimed microcontroller. Applicants respectfully submit that this interpretation of Stecyk, to the extent that it is consistent with the reference does not anticipate the claims.

However, in an effort to move the prosecution forward, Applicants have amended the application herein in order to further clarify the difference between universal remote controls and the present invention.

In the present application, examples of the microcontroller are given as particular XScale microcontrollers with integrated I2C and SPI bus interfaces. One example is a daisy-chained I2C bus through which the microcontroller addresses each tuner individually using assigned addresses. The same paragraph suggests system maintenance, management, and power control as well. The contemplated example is a television chassis that may be fitted with different tuners to suit different territories or customers.

With a universal remote, a user pushes a button for e.g. "pause" and this is converted to the specific IR code for the intended player. The IR code is typically, and in Stecyk, sent to all of the devices simultaneously. However, the command "pause" will only be executed on a device that is configured to use the particular code. There is no addressing. Devices are distinguished by using different codes. If a user has two Mitsubishi VCRs and selects "VCR" and then "pause" then both will respond. If a user

has one Mitsubishi VCR and one Mitsubishi DVD and selects "VCR" and "pause" then the VCR will respond but the DVD will not. There is no return line, and no data.

The Examiner might imagine a return line in which the user sees that the VCR has paused and then pushes another button, such as "play" or "eject." However this return process through the viewer does not use the same control line or control interface. It uses the "video connection" and eventually the graphics controller, completely bypassing the microcontroller.

Referring to Claim 1, the first and second control line interfaces are further described as being to "send and receive control and command data." The corresponding structure in Stecyk would be the IR eye of each respective external device 136. While these are neither shown nor described, a typical IR eye is a passive detector that sends received IR to a decoder. When a code is received that the decoder understands, then an action is taken by the external device. There is no sending of control and command data, only receiving.

In addition, the microcontroller is further described as "having a control line interface coupled through a shared control line to the respective control line interfaces of the first and second tuners... to send and receive control and command data addressed to the respective identified tuner through the shared control line to the respective control line interface of the respective tuner. First, as mentioned above, an IR blaster as shown at 135 in Stecyk does not receive control and command data but sends only. Second, an IR blaster does not use addresses and commands are not addressed. Any device that can parse the IR signal will respond to it.

These amendments clearly distinguish the claimed invention from a universal remote control, an IR blaster, and Stecyk.

Applicants have previously argued that the different IR codes used to address different brands of devices and different types of devices do not constitute different protocols as claimed. This would constitute a further distinction between the claimed invention and universal remote controls. However, the Examiner has rejected this argument and it is not necessary to the allowability of the present claims. Accordingly, the argument is withdrawn.

Applicants submit that Claim 1 is allowable based on the amendments above, *inter alia*. The other independent claims 8, 13, and 18 have been similarly amended and are allowable on the same grounds, *inter alia*.

Applicants have not addressed the Examiner's anticipation rejection with specificity in the interests of simplifying prosecution. The grounds presented above are sufficient to traverse the anticipation rejection. However, Applicants do not waive these arguments.

In brief, some of these arguments are as follows: the TV Control Module 140 does not generate generalized instructions for the external devices. The rejection shows some ambiguity as to where this operation occurs in Stecyk. The TV Control Module controls internal devices. The Device Management System 116 does not convert instructions, it passes instructions to the IR Control Module. The claimed control line would seem to correlate better with the link between boxes 135 and 136, not the IR Control Module 130 as suggested by the Examiner. Finally, it should be noted that Stecyk shows arrows only in one direction from DMS 117 to external devices 136.

As to Claim 2, the claim recites "the tuner further generates command responses." However, the Examiner cites "commands from the remote 20." The remote is not the tuner, therefore Stecyk does not show each and every element of the claim as required for anticipation. The cited flow from remote 20 to the TVCM is in the opposite direction from that recited in the claim.

As to Claim 4, the claim recites, the "first control line interface further comprises an input/output interface..." However, the Examiner cites general paragraphs describing the IR blaster and various connections between components. Applicants respectfully submit that no input/output interface is suggested in Stecyk for the IR receivers of the external devices. The 1394 external devices have input and output but they all use the same protocol and so the claim does not read on them on other grounds.

The other dependent claims are believed to be allowable also for the limitations expressly recited in each such claim, respectively and also for the dependence on an allowable independent claim.

### **Conclusion**

Applicant respectfully submits that the rejections have been overcome by the amendment and remark, and that the claims as amended are now in condition for allowance. Accordingly, Applicant respectfully requests the rejections be withdrawn and the claims as amended be allowed.

### **Invitation for a Telephone Interview**

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

### **Request for an Extension of Time**

Applicant respectfully petitions for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.

Charge our Deposit Account.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,  
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